REMARKS/ARGUMENTS

Pursuant to the above-noted Office Action, claims 1-7, 11-16, 23-25, and 28 were rejected under 35 U.S.C. §102(b) given King et al. (U.S. Patent No. 6,011,554) ("King"). Claims 8-10, 17-22 and 26 and 27 were rejected under 35 U.S.C. §103(a) given King in view of Timmins et al. (U.S. 2004/0096043) ("Timmins"). The Examiner objected to the specification as lacking a "Summary of the Invention" section in the Specification. The applicant respectfully traverses these rejections and requests reconsideration.

The Examiner has objected to the Specification as lacking a section entitled "Summary of the Invention." With all due respect, the applicant notes that inclusion of a titled summary section is discretionary and not specifically mandated or required by any relevant statute or regulation. Accordingly, the applicant prefers to avoid inclusion of this titled section. In this regard, the applicant respectfully requests the reconsideration of the Examiner. If, however, the Examiner persists with this objection, the applicant will comply.

Claims 1-7, 11-16, 23-25 and 28 were rejected as being anticipated by King. King discloses a reduced keyboard disambiguating system. In particular, King receives ambiguous keyboard input and compares possible corresponding textual entries against a pre-established parsed vocabulary to identify a most likely correlation in addition to other, less likely correlations. Accordingly, if a user has tapped the keyboard twice, King will provide a display of one or more two letter candidate selections. To illustrate, if a user has twice asserted the "2" key (which corresponds to the letters "A B C"), King will likely provide a display of the letters "CA" as those letters are more likely to be the intended unambiguous entry. King is therefore seen to describe a disambiguation platform that essentially translates user input.

King's vocabulary module (or modules) can comprise a standard collection of statistically ordered word parts or can be supplemented with parts as correspond to unique words as have been added by the user.

These teachings of King do not anticipate the recitations of the claims. For example, claim 1 requires that at least one additional item of alphanumeric information be "predicted." King, however, offers no prediction capability. King's embodiments are limited to detecting and/or displaying a possible *translation* of already asserted keys but does not serve to *predict*

additional letters as may next be entered by the user. Accordingly, King does not anticipate this step of "predicting."

Claim 1 also requires that this additional item of alphanumeric information be predicted using a "personal context model." As specified by the applicant at page 4 of the Specification:

The personal context model includes both a personal language model that represents a statistical analysis of prior alphanumeric content for this particular user *and context markers that correlate to the personal language model in significant and dynamic ways.*[1]

The applicant provides numerous examples of context information at pages 7-9 of the Specification, with some exemplary context including the nature of a recipients device, the content of a message to which the user is presently replying, the content of previous messages to this particular recipient, the recipient's name, the present time of day, the present day itself, the subject line for the message, a given geographic location, a heading, a speed of travel, and so forth.

King, at best, teaches what might be considered a personal language model. King, however, makes absolutely no teaching or suggestion that the contents of this personal language model be correlated to any other context. Instead, King merely provides for a statistically ordered vocabulary which simply comprises one embodiment of a personal language model.

Accordingly, the applicant vigorously asserts that King does not anticipate the inclusion of a "personal context model" or its indicated usage as is set forth in claim 1. The applicant therefore respectfully submits that claim 1 is allowable over the reference of record and may be passed to allowance.

Remaining claims 2-16 are ultimately dependent upon claim 1, which claim has been shown allowable above. In addition, these claims introduce additional content that, particularly when considered in context with the claims from which they depend, comprises incremental patentable subject matter. For all these reasons, the applicant respectfully submits that claims 2-16 may be passed to allowance.

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[1] Emphasis added.

Independent claim 17 has been rejected as being obvious given King in view of Timmins. Like claim 1, however, claim 17 specifies using a *personal context model* to *predict* subsequent alphanumeric information. As King neither teaches nor suggests such prediction or such use of a personal context model, the applicant respectfully submits that no combination of King and Timmins, regardless of whether that combination is obvious or unobvious, will yield the recitations of claim 17. The applicant therefore respectfully submits that claim 17 may be passed to allowance.

Claims 18-22 are ultimately dependent upon claim 17, which claim has been shown allowable above. In addition, these claims introduce additional subject matter that, particularly when viewed in context with the claims from which they depend, constitutes incremental patentable subject matter. For all these reasons, the applicant respectfully submits that claims 18-22 may be passed to allowance.

Independent claim 23 has been rejected as being anticipated by King. Claim 23 specifies, however, prediction of subsequent alphanumeric information as versus a mere translation as is taught by King. The applicant therefore respectfully submits that King does not anticipate the recitations of claim 23 and that claim 23 may be passed to allowance.

Claims 24-27 are ultimately dependent upon claim 23, which claim has been shown allowable above. In addition, these claims introduce additional content that, particularly when considered in context with the claims from which they depend, constitutes incremental patentable subject matter. For all these reasons, the applicant respectfully submits that claim 24-27 may be passed to allowance.

Lastly, independent claim 28 has been rejected as being anticipated by King. Claim 28, however, again requires a prediction of subsequent alphanumeric information as contrary to the teachings and suggestions of King where only a translation is enabled and effective. The applicant therefore respectfully submits that claim 28 is not anticipated by King and may be passed to allowance.

There being no other objections to or rejections of the claims, the applicant respectfully submits that claims 1-28 may be passed to allowance.

Respectfully submitted,

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